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March 8, 2024

By ECF

Honorable Colleen McMahon United States District Judge United States District Court Southern District of New York 500 Pearl Street New York, New York 10007

In Re: New York City Policing During Summer 2020 Demonstrations,

No. 20 Civ. 8924 (CM) (GWG) This filing is related to all cases

Your Honor:

I am a Senior Counsel in the Office of the Honorable Sylvia O. Hinds-Radix, Corporation Counsel for the City of New York, and one of the attorneys assigned to the above-captioned matters. Defendants write in response to the Police Benevolence Association's letter motion requesting a stay pending appeal of the Court's February 7, 2024 Decision and Order. Defendants take no position with regard to the PBA's motion requesting a stay pending appeal.

By way of background, on February 27, 2024, Defendants did move for a brief stay of the implementation of the Settlement Agreement until such time as the PBA filed a Notice of Appeal. The PBA has now field their Notice of Appeal. While Defendants maintain the positions taken in their February 27<sup>th</sup> letter regarding the implementation of the Settlement Agreement, they take no position with regard to the PBA's motion requesting a stay pending appeal. Defendants do not believe that the PBA has grounds to appeal the Court's February 27, 2024 Decision and Order.

Respectfully submitted,

/s/ Omar, J. Siddiqi Omar J. Siddiqi Senior Counsel

Special Federal Litigation Division

cc: ALL COUNSEL (via ECF)